REMARKS

Status of the Claims

- Claims 1, 3, 5-8, 10, 11 and 16-19 are pending in the Application after entry of this amendment.
- Claims 1-19 are finally rejected by Examiner.
- Claims 2, 4 and 9 are cancelled without prejudice or disclaimer.
- Claims 1, 5, 8, 10 and 11 are amended by Applicant.

Claim Rejections Pursuant to 35 U.S.C. §102

Examiner has rejected Claims 1, 4 and 7-10 under 35 U.S.C. §102(e) as anticipated by US. Pat. No. 6,487,533 to Hyde-Thompson et al. Applicants respectfully traverse the §102(e) rejection.

Hyde-Thompson et al. discloses a messaging system which includes a voice gateway server coupled to an electronics mail system and PBX exchange. According to Hyde-Thompson et al.,

> Referring also now to FIG. 2, a block diagram of a first and preferred embodiment of a voice gateway server 140 constructed in accordance with the present invention is shown. In the preferred embodiment, the voice gateway server 140 comprises a voice board 200, a network interface unit 202, a processing unit 204, a data storage unit 206, and a memory 210 wherein a plurality of voice messaging application units 220, 222, 224, 226; [.....] Each element within the voice gateway server 140 is coupled to a common bus 299. The network interface unit 202 is additionally coupled to the network line 136, and the voice board 200 is coupled to the PBX 120. (Hyde-Thompson col. 4, lines 25-39).

Figure 2 of Hyde-Thompson et al. discloses a common bus (299) connecting a network interface unit (202), a voice board (200) which interfaces to the PBX via lines 142, and a memory (210), which contains the applications for voice messaging (220). However, Hyde-Thompson, et al. does not disclose a network interface unit having an internal bus which interconnects a first module, a second module, and an embedded services processor (ESP) where the first module acts as an interface to a messaging platform, the second module acts as an interface to a telephone network and the ESP has an external network interface for

connecting to at least one external server computer useful for multimedia processing for the messaging platform as recited in amended Claim 1.

Applicants have amended independent Claim 8 to recite that the ESP includes an external network interface for connecting to an external server computer for executing at least one multimedia application for the messaging platform. Hyde-Thompson et al does not teach the execution of a multimedia application for the messaging platform by an external server connected to a network interface of an ESP.

Since Hyde-Thompson et al. fails to teach or suggest the above mentioned features, it cannot anticipate amended independent Claims 1 and 8. Accordingly, Applicants respectfully request withdrawal of the §102(e) rejection and submit that amended independent Claims 1 and 8 patentably define over the cited art.

Applicants have cancelled dependent Claim 4 without prejudice or disclaimer. Applicants respectfully request withdrawal of the §102(e) rejection of dependent Claim 7 because it depends independent Claim 1 which patentably defines over Hyde-Thompson et al. Similarly, Applicants request withdrawal of the §102(e) rejection of dependent Claims 9-10 because these claims depend on independent Claim 8 which patentably defines over Hyde-Thompson et al.

Claim Rejections Pursuant to 35 U.S.C. §103

Claims 2-3, and 11 stand rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,487,533 to Hyde-Thompson et al. in view of U.S. Patent No. 6,233,318 to Picard et al. Applicants respectfully traverse the rejection.

Claim 2 has been cancelled without prejudice or disclaimer. Claim 3 is dependant from independent Claim 1. As mentioned above, Hyde-Thompson et al does not teach or suggest the execution of a multimedia application for the messaging platform by an external server connected to a network interface of an ESP, the ESP being coupled to the first and second interfaces to support communications and being part of a Network Interface Unit having an internal bus, and as in amended Claims 1 and 8. Applicants submit that the addition of Picard et al. fails to remedy the disclosure shortcoming of Hyde-Thompson et al. Picard et al fails to teach or suggest an ESP coupled to an internal bus and supporting

communications between a first module interfacing to a messaging platform and a second module interfacing to a telephone network, an ESP having an external network interface and connecting to at least one external server that performs multimedia processing for the messaging platform.

As a result, Applicants respectfully submit that the Examiner has failed to establish a prima facie case of obviousness per 35 U.S.C §103(a) (See MPEP 706.02(j)). Applicants note that neither Hyde-Thompson et al. nor Picard, et al., either alone or in combination, teach or suggest all of the elements of independent Claim 1 which supports dependent Claim 3. Therefore, Hyde-Thompson et al. in view of Picard et al. cannot render obvious dependent Claim 3. Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of Claim 3 as it patentably defines over the cited art.

Claims 5-6 stand rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,487,533 to Hyde-Thompson et al. in view of U.S. Patent No. 5,283,879 to Carteau et al. Applicants respectfully traverse the rejection.

Applicants note that Carteau et al. is non-analogous art because Carteau et al. discloses a method for fast writing of information applicable to disk memory apparatus. (Carteau et al. Col 1 lines 5-10.) In addition, Carteau et al. does not teach a telephony messaging system and does not teach or suggest that an ESP coupled to an internal bus and supporting communications between a first module interfacing to a messaging platform and a second module interfacing to a telephone network, an ESP having an external network interface and connecting to at least one external server that performs multimedia processing for the messaging platform as in independent Claim 1 from which Claims 5-6 depend. Hyde-Thompson et al., as noted above, also does not teach or suggest the mentioned elements.

Thus, even if Carteau et al. was analogous art, the combination of Hyde-Thompson et al. and Carteau et al. cannot render obvious dependent Claims 5-6. Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of Claims 5-6 as these claims patentably define over the cited art.

Claims 16-19 stand rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,487,533 to Hyde-Thompson et al. in view of U.S. Patent No. 6,396,907 to Didcock. Applicants respectfully traverse the rejection.

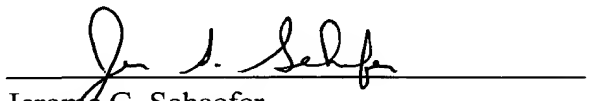
Dependent Claims 16 and 17 are dependent on independent Claim 1 and Claims 18 and 19 are dependent on independent Claim 8. As stated above, Hyde-Thompson et al. does not teach or suggest that an ESP coupled to an internal bus and supporting communications between a first module interfacing to a messaging platform and a second module interfacing to a telephone network, an ESP having an external network interface and connecting to at least one external server that performs multimedia processing for the messaging platform as stated in independent Claims 1 and 8 from which Claims 16-19 depend. Didcock, also does not teach or suggest the above-mentioned elements.

Thus, the combination of Hyde-Thompson et al. and Didcock cannot render obvious dependent Claims 16-19. Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of Claims 16-19 as these claims patentably define over the cited art.

Conclusion

In view of the above remarks, Applicants submit that the present application is in a condition for allowance upon entry of the amendments herein. Applicants respectfully and earnestly solicit a Notice of Allowance for all pending claims.

Date: January 6, 2005



Jerome G. Schaefer
Registration No. 50,800

Woodcock Washburn LLP
One Liberty Place - 46th Floor
Philadelphia PA 19103
Telephone: (215) 568-3100
Facsimile: (215) 568-3439